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As an owner and president of Holiday Brook Farm I would like to comment on the proposed final regulation (225 CMR 14.00) to the Department of Energy Resources (DOER). Holiday Brook Farm is 1,300 acres with 960 acres of managed forest land under CH 61, most of which is also under a CR. the income from forest management is critical the the economic viability of the farm as a whole. The most challenging part of forest management for us is finding markets for the low grade trees and logs that must be cut to increase the value of the residual stands and ensure the regeneration of productive stands that justify forest land ownership. The proposed biomass regulations will take an important opportunity to improve forest management away and will make it more costly to do sustainable management.

It is also important to recognize that maintaining the forested landscape of Massachusetts depends on the success of sustainable and economically viable forest management on private forestland. Farmers and private forest landowners will be discouraged from continuing to maintain their land in forest as the result of DOER's proposed regulations. In a state with few natural resources other than our forests, regulations should increase markets for low grade wood and support sustainable long term management not make it prohibitively expensive and un marketable as these regulations do.

While the intent of the biomass regulations are to reduce greenhouse gas emissions they are based on a fundamentally flawed study. The contorted eligibility requirements and limitations for forest biomass fuel have no apparent silvicultural, ecological, or economic basis. Worse yet they encourage high grading by basing the amount of biomass eligible for RECs on the volume of the timber harvested. This both encourages over cutting in timber harvests to get more REC eligible chips and discourages improvement cutting and salvage in low value stands because few or no chips will be eligible because there are no logs to measure a percentage of. Additionally, the monitoring and tracking requirements will in increase the cost of improvement cuts in low value stands to the point where they will not be economically viable. The result of this part of the proposed regulations will assure that high quality trees that should be left to grow will be cut and that low quality stands that could be improved won't. This will further erode the viability of forestland ownership and lead to the loss of more forest land.

DOER has based these regulations on the fear of forest loss as the result of biomass harvesting. The unintended but real consequence is the regs themselves will be the cause of forestland conversion and depletion of the sequestration potential of the landscape in Massachusetts.

Sincerely yours,

Dicken Crane, President

Holiday Brook Farm